



WESTBROOK

November 27, 2001

Ms. Gloria Blue
Executive Secretary
Trade Policy Staff Committee
Office of the U.S. Trade Representative
600 17th Street, N.W.
Washington, D.C. 20508

Re: Potential Action Under Section 203 of the Trade Act of 1974 With
Regard to Imports of Certain Steel – Comments on Exclusion
Request for Stainless Steel Flange Forgings.

Dear Ms. Blue:

Westbrook supports the request filed by Gerlin, Inc. to exclude stainless steel flange forgings (HTSUS 7303.21.1000) from any action the President may take with respect to imported steel products.

Westbrook manufactures a wide range of stainless steel flanges, measuring from ½ inch to 24 inches, in our Houston, Texas plant. Flanges are made from flange forgings. Westbrook has the manufacturing capability to produce forgings used to make 3 inch and smaller flanges, but we are unable to produce forgings used to make larger flanges. As a result, we must purchase the larger-sized forgings from outside sources, and manufacture them into flanges at our plant.

In the United States, integrated producers, such as Westbrook, are the only manufacturers of flange forgings. Just as Westbrook produces forgings for its own consumption, so do all of the other integrated U.S. producers. Thus, there is no U.S. commercial market to speak of for flange forgings, and virtually all of the forgings we purchase are from foreign sources.

On occasion, we have purchased flange forgings from U.S. producers to fill rush orders for loyal customers in order to maintain their business. But, typically we take a loss on these orders because the domestic producers sell the forgings to us at roughly the same price for which we must sell the finished flanges to our customers. Not surprisingly, U.S. producers are not interested in selling forgings to us at a competitive price because we compete with them for business in the finished flange market.

We understand that any import relief granted by the President is supposed to help U.S. companies adjust to import competition. If relief is granted to imported flange forgings – our only source of forgings in commercial quantities at competitive prices – we would be forced to cease our manufacture of stainless steel flanges altogether.

For these reasons, Westbrook urges the President to exclude stainless steel flange forgings from the coverage of any import relief provided under Section 203. Thank you for your consideration.

Sincerely yours,



Charles Westbrook
President and CEO

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